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10
11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

13 FRANK UNDERHILL, JR., an individual,

14 Plaintiff,

15 vs.

16 FOR THE EARTH CORPORATION, an
17 Arizona Corporation; NELSON GRIST, an
individual; DOES I through X, inclusive; and
18 ROE ENTITIES XI through M, inclusive,

19 Defendant.

Case No.: 2:21-cv-01287-VCF

**STIPULATION TO EXTEND
DEADLINE FOR DEFENDANTS TO
RESPOND TO PLAINTIFF'S
COMPLAINT**

(FIRST REQUEST)

20 IT IS HEREBY STIPULATED by and between Plaintiff Frank Underhill Jr., ("Plaintiff"),
21 through his counsel EAD Law Group, LLC, and Defendants Integrity Health Corporation f/k/a For
22 The Earth Corporation and Nelson Grist ("Defendants"), through their counsel Jackson Lewis P.C.,
23 that Defendants shall have a 14-day extension up to and including Wednesday, July 28, 2021, in
24 which to file their respective responses to Plaintiff's Complaint. This Stipulation is submitted and
25 based upon the following:

26 1. Defendants' respective responses to Plaintiff's Complaint are currently due on July
27 14, 2021.
28

2. Due to defense counsel's recent retention, Defendants require additional time to investigate Plaintiff's allegations before responding to the Complaint.

3. This is the first request for an extension of time for Defendants to file responses to Plaintiff's Complaint.

4. This request is made in good faith and not for the purpose of delay.

5. Nothing in this Stipulation, nor the fact of entering into the same, shall have the effect of or be construed as waiving any claim or defense held by any party hereto.

Dated this 14th day of July, 2021.

EAD LAW GROUP, LLC

JACKSON LEWIS P.C.

/s/ Elaine Dowling

/s/ Joshua A. Sliker

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*Attorney for Plaintiff
Frank Underhill, Jr.*

*Attorneys for Defendants
For The Earth Corporation,
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ORDER

IT IS SO ORDERED



United States Magistrate Judge

Dated: 7-15-2021